

Keeping your Risk Management Program in Compliance

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General Requirements

- Management system not developed and implemented
- Recommend an organizational chart to reflect duties in the management system by position
- Most importantly, implement your Prevention Program and Emergency Response Plan

Risk Management Plan Submittal

- Initial submittal before exceeding a regulated substance threshold
- Public Document does not need all technical documents, but should describe them and include summaries of PHA, Program Elements, etc.
- Update as needed

Program 1, 2 and 3

- Based on potential risk
- Program 1 no offsite consequences
- Program 3 sites have higher potential risks than Program 2.

Hazard Assessment

- Prevention Program 1-one worst case scenario
- Prevention Program 2 and 3-one worst case and one alternative scenario
- Must use RMP Offsite consequence Analysis guidance or industry recognized modeling program
- List any sensitive receptors and estimated total population.
- Update as needed and at least every five years

Prevention Program 2

- Safety information
 - Include MSDS, maximum inventory, safe operating parameters, equipment specs and codes and standards used
 - Ensure the process is designed compliant to regulations and industry/engineering standards
 - Update as needed

Hazard Review

- Identify all hazards
- List safeguards in place to minimize hazards
- Identify steps used to detect or monitor releases
- Update at least every five years or after a major process change

Operating Procedures

- Must be in writing
- Shall cover the following
 1. Initial startup
 2. Normal and temporary operations
 3. Emergency shutdown and operations
 4. Normal Shutdown
 5. Start up procedures after a normal or emergency shutdown
 6. Consequences of system deviations and how to afford these
 7. Equipment inspections

Training Program

- All employees working with a covered process must be trained in operating procedures
- Refresher training at least every three years
- Train in any new or updated procedures prior to start up

Maintenance

- Implement procedures for ongoing mechanical integrity
- Train employees in covered process maintenance
- Maintenance contractors must train their employees in proper procedures
- Perform inspections on process equipment
- Document maintenance completed

Compliance Audits

- Required every three years
- Must be conducted by at least one person knowledgeable in the process
- Must complete a written audit report
- Must address audit findings promptly
- Retain the most two recent audit reports
- Checklists are available from USEPA

Incident Investigations

- Needed for all real or reasonably expected catastrophic releases
- Recommended for all real or threatened releases
- Must begin within 48 hours
- Written summary is required. Keep for five years
- If catastrophic, add to five year accident history within six months

Prevention Program 3

- Process safety information
 1. Material Safety Data sheets
 2. Information on the technology of the process
 3. Information on the equipment in the process
 4. Document that the equipment complies with good engineering practices
 5. Document that the equipment is designed, operated, maintained, and inspected in a safe manner

Process Hazard Analysis

- Appropriate PHA methodology
- Address all reasonable hazards
- Performed by a team experience with the process
- Address the PHA's finding
- Updated and revalidated at least every five years

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 5. Start up procedures after a normal or emergency shutdown
 6. Consequences of system deviations and how to afford these
 7. Equipment inspections
- Annual certification the procedures are current and accurate

Training

- All employees working with a covered process must be trained in operating procedures
- Refresher training at least every three years
- Train in any new or updated procedures prior to start up
- Document training conducted and that employees understand the training

Mechanical Integrity

- Look at all components of the covered process
- Need written procedures
- Employee training on maintenance
- Regular inspections and testing
- Correct Deficiencies

Management of Change

- Not for replacement in kind
- Major process changes
- Document with a written form
- Train employees prior to the change
- Modify your operating procedures as needed

Pre-Startup Review

- For new or modified stationary sources
- Pre-startup Safety Review shall confirm
 1. Design specifications have been met
 2. Safety, operating, maintenance, and emergency procedures are in place
 3. PHA has been conducted and recommendations implemented
 4. All employee training has been conducted

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Employee Participation

- Must have a written plan for employee participation
- Employees and their reps must be consulted for the Process Hazard Analysis
- Employees and their reps must have access to all information required by the CalARP regulations.

Hot Work Permit

- Must issue a hot work permit for all hot work done by a covered process
- The permit must document that all fire prevention and protection requirements have been met
- Produced by the stationary source or contractor

Hot Work Permit Example

HOT WORK PERMIT

BEFORE INITIATING HOT WORK, CAN THIS JOB BE AVOIDED?

IS THERE A SAFER WAY?

NOTES:

HOT WORK PERMIT

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HOT WORK PERMIT

Contractors

- Owners or operators responsibilities
 1. Obtain information on the contractors safety
 2. Inform the contractor of the hazards of the covered process
 3. Explain the emergency response plan
 4. Develop safe practices for the entry, presense, and exit of contractors
 5. Evaluate the contractor's safety performance

Contractors

- Contractor's responsibility
 1. Assure employees are trained in safety
 2. Assure employees are trained in the potential hazard of a covered process
 3. Document all training
 4. Assure all employees follow safety procedures
 5. Advise the owner/operator of any unique hazards his work may cause

Emergency Response Program

- Required by responding agencies
- Non responding agencies must:
 1. Be included in the community emergency response plan/area plan
 2. Coordinate with local emergency responders

Emergency Response Program

- Must include the following:
 1. Procedures for coordinating with emergency responders
 2. First aid for exposures to a regulated substance
 3. Procedures for how to respond to an emergency release

Emergency Response Program

- Contain procedures for emergency response equipment
- Training for all responding employees
- Procedures to review and update the emergency response plan as needed

This presentation is only one of many compliance tools

- EPA guidance documents
 - <http://www.epa.gov/emergencies/content/rmp/index.htm>
- OES guidance documents
 - <http://www.oes.ca.gov/Operational/OESHome.nsf/978596171691962788256b350061870e/452A4B2AF244158788256CFE00778375?OpenDocument>
- San Diego County guidance documents

CalARP is not easy
Any Questions?

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